

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
Case No: 1:24-CV-00221**

**CRAIG CUNNINGHAM,**

*Plaintiff,*

**v.**

**WALLACE & GRAHAM, P.C.,  
MONA LISA WALLACE, BILL  
GRAHAM, WHITNEY WALLACE  
WILLIAMS, MARK P. DOBY,  
RHINE LAW FIRM, P.C., JOEL R.  
RHINE, SOKOLOVE LAW, LLC,**

*Defendants.*

**DEFENDANT AND THIRD-  
PARTY PLAINTIFF SOKOLOVE  
LAW, LLC'S MOTION TO  
COMPEL**

**SOKOLOVE LAW, LLC,**

*Cross-Plaintiff,*

**v.**

**BRENT NILS CUSHMAN and  
BLAZEN MEDIA, LLC,**

*Third-Party Defendants.*

Defendant and Third-Party Plaintiff Sokolove Law, LLC, ("Sokolove Law"), by counsel and pursuant to Fed. R. Civ. P. 36 and 37, moves to compel responses to Requests for Admissions Nos. 5, 14, 15, 19, 20, 21, 22, 24, and 25 or, in the alternative, deem each of these Requests admitted, and award Sokolove Law its costs and fees pursuant to Rule 37(a)(5). As explained more fully in the accompanying Memorandum in Support of its Motion, Plaintiff has failed to provide responses to these Requests,

objecting that the Requests are harassing or irrelevant, despite the fact that each of the Requests seek admissions related to Plaintiff's allegations in the Complaint.

WHEREFORE, Defendant Sokolove Law, LLC respectfully requests that the Court grant its Motion, require Plaintiff to provide responses to Requests for Admission 5, 14, 15, 19, 20, 21, 22, 24, and 25 or, in the alternative, deem each of these Requests admitted, and award Sokolove its costs and fees pursuant to Rule 37(a)(5).

Respectfully submitted, this 2nd day of May, 2025.

**SOKOLOVE LAW, LLC**

By: /s/ Virginia Bell Flynn  
Virginia Bell Flynn (N.C. State Bar No. 59109)  
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*Counsel for Defendants*

### **CERTIFICATE OF CONFERENCE**

I hereby certify that counsel for both parties engaged in a personal consultation and diligent attempts to resolve the differences between the parties, including letter and email exchanges throughout the month of April and a telephone conference on May 1, 2025 at 1:30 p.m. At the telephone conference on May 1, Andrew Perrong appeared for Plaintiff and Brooke Conkle appeared for Defendant Sokolove Law. During the conference and confirmed in writing following the conference, counsel for Plaintiff represented that Plaintiff would stand on his objections regarding Requests No. 5, 14-16, 19-22, and 24-25 and that Plaintiff would provide qualified responses to Requests 3, 6, 8-11, 17-18, and 23 by May 7.

Counsel for the parties discussed expedited resolution of discovery disputes under Local Rule 37.1(b). Counsel for Plaintiff did not agree to a telephone conference and stated that the dispute would likely be resolved with an in-court hearing of no more than one hour.

By: /s/ Virginia Bell Flynn

**CERTIFICATE OF SERVICE**

I hereby certify that on this 2nd day of May 2025, I electronically filed the foregoing *Motion to Compel* with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

By: /s/ Virginia Bell Flynn  
Virginia Bell Flynn